MICHELE A. BECKWITH 1 Acting United States Attorney 2 KAREN A. ESCOBAR **Assistant United States Attorney** 3 2500 Tulare St., Suite 4401 Fresno, CA 93721 4 KRISTEN CLARKE 5 Assistant Attorney General Civil Rights Division MICHAEL J. SONGER 6 Special Litigation Counsel Criminal Section, Civil Rights Division United States Department of Justice 8 Attorneys for Plaintiff United States of America 9 10 IN THE UNITED STATES DISTRICT COURT 11 EASTERN DISTRICT OF CALIFORNIA 12 13 UNITED STATES OF AMERICA, 14 Plaintiff, 15 v. J. DESHAWN TORRENCE, 16 17 Defendant. 18 19 20 21

TIME: 8:30 a.m. COURT: Hon. Todd W. Robinson

DATE: January 14, 2025

CASE NO. 1:22-CR-00207 TWR-SKO

GOVERNMENT'S EXHIBIT LIST

The United States, by and through its undersigned counsel, hereby submits the following list of exhibits it intends to introduce in its case-in-chief:

<b>EXHIBIT</b>	DESCRIPTION	BATES RANGE	<u>IDENTIFIED</u>	<u>ADMIT</u>
<u>NO.</u>				<u>TED</u>
	BG Evidence			
1-a	Photo of area of assault of BG	80450		
1-b	Photo of area of assault of BG	80451		
1-c	Photo of area of assault of BG	80452		

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1-d	Google map satellite overview of area of	80446
	assault of BG	
1-e	Google map satellite overview of area of assault of BG	80448
1-f	Google map of Sanger and Centerville	86729
1-g	Google image of Sanger cemetery	86939
1-h Google image of Centerville Elementary School		86940
1-i	BG photo	
	MCG Evidence	
2-a	MCG photo	
2-b	SPD Officer Guillen report of MCG statement	77109-12
2-с	SPD Officer Guillen BWC footage #1 from police vehicle	77122
2-d	SPD Officer Guillen BWC footage #2 from police vehicle	77121
2-e	SPD Officer Guillen BWC footage #3 at SPD	77123
2-f	Still shot of MCG's phone contact	77175
2-g	Photograph of defendant	77173
2-h	Photograph of defendant	77174
2-i	MCG handwritten notes	74072-76
2-ј	Aerial photograph of MCG's Residence	87736
	LS Evidence	
3-a	Leticia Tovar's audio and video recording of statement (7-8-21)	376
3-b	LS's audio and video recording of statement (7-8-21)	288

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3-с	Defendant's BWC of Jade Hernandez's statements (6-11-2020)	79834	
3-d	Google map of LS residence		
3-е	Intentionally left blank		
3-f	LS photo		
	SW Evidence		
4-a	SPD Report 180001007	49359-67	
4-b	Photo of SW taken by defendant	76810	
4-c	Photo of SW taken by defendant	76814	
4-d	Photo of SW taken by defendant	76815	
4-e	Photo of SW's bathroom taken by defendant	76817	
4-f	Defendant's first recording of 2/28/18 incident	76853	
4-g	Excerpt of defendant's second recording of 2/28/18 incident	76854	
4-h	SW notes	433-37	
4-i	Excerpt of Theo Ledbetter recording	51523	
4-j	SW 3/25/18 complaint to SPD	86739-44	
4-k	SW's phone logs and photo	76844-46	
4-1	SW photo of discarded cigarette package	51360	
4-m	SW Photo		
4-n	SW Timeline		
4-o	SW text to sister	51298	
	Sanger PD (SPD) Evidence		
5-a	2016 SPD Policy 702.6(e) re: Personal Communication Device	84853	

1		5-b	2016 SPD Policy 810.5.1	84889
ا ر		3-0	re: Collection of Digital	
2	Evidence			
3		5-c	2016 SPD Policy 320.4(e)	84518-19
		<i>3-</i> C	re: Domestic Violence	
4		5-d	2016 SPD Policy 340.5 re:	84576-84581
5			Causes for Discipline	
<sup>3</sup>		5-e	2019 SPD Policy 808.9 re:	85500
6			Penalties for Misuse of	
_	-		Records	0.4507
7		5-f	SPD Policy 350.2.2 re:	84596
$_{8}\parallel$			Selection and	
8			Appointment of Police Reserve Officers	
9	-		SPD Policy 104.1.1 re:	85025
		5-g	Oath of Office	03023
10	ŀ		Defendant's red camera	[physical
11		5-h	found in SPD locker	evidence]
11	-		SD card for red camera	[physical
12		5-i	found in SPD locker	evidence]
.	-		Defendant's	86807
13		5-j	acknowledgement of 2016	
14			SPD policy	
-	Ī	5.1	SPD equipment roster	86789
15	ļ	5-k		
16		5-1	Defendant's first day of	83270
16	ŀ		work (payroll) (3/28/16)	
17		5-m	Index of photos submitted	
			with SW domestic	
18	-		violence report	
19			Fresno County SO (FSO) Evidence	
19	F		Defendant's blue Apple	[physical
20		6-a	iPhone	evidence]
_	ŀ		FBI Forensic Examiner	86315-16
21		6-b	Garcia Lomeli's 902(13)	
22			certificate re: extraction of	
			contents of Defendant's	
23			blue Apple iPhone	
_,	Ī	(	FBI Cellebrite	86808-11
24		6-c	examination showing	
25			assignment of telephone	
			number 559-931-3568 to	
26			blue Apple iPhone	
27		6-d	8/15/2022 recording of	80649
27		- u	call by defendant	
- 11				

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	0/07/0000 1: 0	00640
6-е	9/27/2022 recording of	80649
	call by defendant	
6-f	9/27/2022 recording of	80649
0-1	call by defendant	
6 ~	11/12/2022 recording of	80649
6-g	defendant=	
C 1	3/11/2023 recording of	80649
6-h	defendant	
6-i	FSO 7-15-21 audio	26810
	recording of SW	
	identifying defendant	
	Defendant's unit history,	86788
6-j	CLETS data, CLETS	
	warrant search for	
	10/18/17	
	Incident details for	86853-54
6-k	10/18/17	
	LS voicemail	87740
6-1	LS voiceman	07740
	Defendant's unit history	86788
6-m	for 10/18/17	
	<b>Business Records</b>	
	Business records	
	T-Mobile subscriber info	53661
7-a	for defendant's phone	
	559-931-3568	
	T-Mobile records for	78934-78981
7-b	defendant's phone 559-	
	931-3568 for bill close	
	date 11/26/17	
	T-Mobile records for	78780-78815
7-c	defendant's phone 559-	, , , , , , , , , , , , , , , , , , , ,
	931-3568 for bill close	
	date 12/26/17	
	T-Mobile records for	78982-79020
7-d	defendant's phone 559-	70,02 7,020
	931-358 for bill close	
	date 1/26/18	
	T-Mobile records from	78520-49
7-е	2/27/18-3/26/18 for	10320 17
	defendant's phone 559-	
	931-3568	
	T-Mobile records for	52283-52331,
7-f		
	defendant's phone 559-	74307-11, 77360
	931-3568	96726
7-g	Chart: Phone contacts	86736
	with MCG	

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7-h	Chart: Phone contacts	86735	
, 11	with LS		
7-i	Chart: Phone contacts with SW	86737	
7-ј	Redacted Apple iCloud record (10/19/17, 12:41 a.m.) of photo of MCG information from SPD Mobile Data Terminal (MDT)	86715	
7-k	Redacted Apple iCloud record (1/25/17) of photo of photo of H.M. on her phone	86723	
7-1	Redacted Apple iCloud record (1/25/17) of photo of photo of H.M. on her phone	86724	
7-m	T-Mobile Sanger cell tower chart	87737	
	FBI Evidence		
8-a	Graphic comparison of numerical sequence	86812	
8-b	Graphic comparison of IMG_2824 and photo from SD card	86813	
8-c	Photo of red camera (front)	81268	
	Miscellaneous		
9-a	Road Map		
9-b	Earth Map		
9-с	Defendant's CA DMV Info (as of 7/6/21)	489	

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1	Dated: January 13, 2025	MICHELE A. BECKWITH
2		Acting United States Attorney
3		By: /s/ KAREN A. ESCOBAR KAREN A. ESCOBAR
4		Assistant United States Attorney
5		MANAGERY OF A DATE
6		KRISTEN CLARKE Assistant Attorney General Civil Rights Division
7		
8		By: /s/MICHAEL J. SONGER MICHAEL J. SONGER
9		Trial Attorney
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